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OMB Number: 3235-0123 Expires: August 31, 2020

Estimated average burden hours per response...

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12.00

SEC FILE NUMBER

8-49748

Washington DC

Section

FFB 272018

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**ANNUAL AUDITED REPORT** 

FORM X-17A-5 PART III

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING	01/01/2017	AND ENDING	<u> </u>		
	MM/DD/YY		MM/DD/YY		
A.	REGISTRANT IDENTIFICATION	ON			
NAME OF BROKER-DEALER:			OFFICIAL USE ONLY		
Sunbelt Securities, Inc.					
ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (I	FIRM ID. NO.				
2700 Post Oak Blvd, Suite 1700					
	(No. and Street)				
Houston	Texas		77056		
(City)	(State)		(Zip Code)		
NAME AND TELEPHONE NUMBER OF PERSON TO	) CONTACT IN REGARD TO T	HIS REPORT			
			(Area Code - Telephone No.)		
В. а	ACCOUNTANT IDENTIFICATI	ON			
INDEPENDENT PUBLIC ACCOUNTANT whose opini	on is contained in this Report*		•		
Moss Adams, LLP					
(Nam	e – if individual, state last, first, middle n	ame)			
8750 N. Central Expressway, Suite 300	Dallas	TX	75231		
(Address)	(City)	(State)	(Zip Code)		
CHECK ONE:  Certified Public Accountant Public Accountant Accountant not resident in United Sta	tes or any of its possessions.				
	FOR OFFICIAL USE ONLY				

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2).

DW

### **OATH OR AFFIRMATION**

l,	David S	metek, sw	vear (or affirm) that, to the best of my knowledge and belief the
accon	panying	financial statements and supporting schedules per	taining to the firm of Sunbelt Securities, Inc, as of
	nber 31_		ner swear (or affirm) that neither the company nor any partner,
propri as foll		ipal officer or director has any proprietary interest	in any account classified solely as that of a customer, except
			Signature
			President
		Haidi latham	· <del>···</del>
		Notary Public	HEIDI LATHAM
	This re X (a) X (b)		My Notary ID # 12173514 Expires November 21, 2020
	X (c)	Statement of Income (Loss). Statement of Cash Flows.	
	(e) (f) (g)	Statement of Changes in Liabilities Subordinated to Claims Computation of Net Capital.	s of Creditors.
		Information Relating to the Possession or Control Requirer A Reconciliation, including appropriate explanation, of the	ments Under Rule 15c3-3. he Computation of Net Capital Under Rule 15c3-1 and the Computation for
	∏ (k) ⊠ (l)	An Oath or Affirmation.	A of Rule 15c3-3. ments of Financial Condition with respect to methods of consolidation.
		<ul> <li>A copy of the SIPC Supplemental Report.</li> <li>A report describing any material inadequacies found to exit</li> </ul>	st or found to have existed since the date of the previous audit.

<sup>\*\*</sup>For conditions of confidential treatment of certain portions of this filing, see Section 240.17a-5(e)(3).

### SUNBELT SECURITIES, INC.

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### Report of Independent Registered Public Accounting Firm

To the Board of Directors Sunbelt Securities, Inc.

### Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of Sunbelt Securities, Inc. (the Company) as of December 31, 2017, the related statements of income, changes in Stockholders' equity, and cash flows for the year then ended, and the related notes (collectively referred to as the "financial statements"). In our opinion, the financial statements present fairly, in all material respects, the financial position of the Company as of December 31, 2017, and the results of its operations and its cash flows for the year then ended, in conformity with accounting principles generally accepted in the United States of America.

#### Basis for Opinion

These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on the Company's financial statements based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to the Company in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether due to error or fraud. Our audit included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures to respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audit provides a reasonable basis for our opinion.

### Opinion on the Supplementary Information

The supplementary information in Schedule I has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The information in Schedule I is the responsibility of the Company's management. Our audit procedures include determining whether the information in Schedule I reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in Schedule I. In forming our opinion on the information in Schedule I, we evaluated whether the information in Schedule I, including its form and content is presented in conformity with 17 C.F.R. §240.17a-5. In our opinion, the information in Schedule I is fairly stated in all material respects in relation to the financial statements as a whole.

Dallas, Texas

February 16, 2018

Moss Adams LLP

We have served as the Company's auditor since 2016.

# SUNBELT SECURITIES, INC. Statement of Financial Condition December 31, 2017

### **ASSETS**

Cash and cash equivalents Receivable from broker dealers Commissions receivable Other receivables Securities	\$ 1,057,072 63,426 524,841 204,364 
LIABILITIES AND STOCKHOLDERS' EQUITY	
Liabilities Accrued expenses Commissions payable	\$ 52,036 677,499 729,535
Stockholders' equity Preferred stock, 85,000 shares authorized, Series A convertible, with \$ .001 par value 85,000 shares issued and outstanding	85
Common stock, 10,000,000 shares authorized with \$.001 par value, 40,000 shares issued and outstanding	40
Additional paid in capital	1,157,918
Retained earnings (deficit)	(22,008)
Total stockholders' equity	<u>1,136,035</u>
	<u>\$ 1,865,570</u>

# SUNBELT SECURITIES, INC. Statement of Income For the Year Ended December 31, 2017

Revenues	
Securities commissions	\$ 10,609,714
Interest income	25,532
	10,635,246
Expenses	
Compensation	2,252,308
Commissions and clearance paid to all other brokers	7,239,494
Communications	71,271
Occupancy and equipment costs	79,661
Regulatory fees and expenses	129,515
Interest expense	30,000
Other expenses	<u>824,588</u>
	10,626,837
Income (loss) before income taxes	8,409
Income Tax Expense	0-
Net Income	\$ 8.409

## SUNBELT SECURITIES, INC. Statement of Changes in Stockholders' Equity For the Year Ended December 31, 2017

	Shares	erred ock	Shares	nmon ock	Additional Paid in Capital	Retained Eamings (Deficit)	Total
Balances at December 31, 2016	85,000	\$ 85	40,000	\$ 40	\$ 1,157,918	\$ (30,417)	\$ 1,127,626
Net income (loss)						8,409	8,409
Balances at December 31, 2017	85,000	\$ 85	40,000	\$ 40	\$ 1,157,918	\$ (22,008)	<b>\$ 1,136,035</b>

# SUNBELT SECURITIES, INC. Statement of Cash Flows For the Year Ended December 31, 2017

Cash flows from operating activities  Net income (loss)  Adjustments to reconcile net income (loss) to net cash provided (used) by operating activities:	\$	8,409	
Change in assets and liabilities:  Decrease in receivable from broker dealers Increase in commissions receivable Increase in other receivables Increase in securities owned Decrease in accrued expenses Increase in commissions payable Decrease in federal income taxes payable		10,031 (170,646) (72,985) (5,502) (43,112) 127,286 (3,522)	
Net cash provided (used) by operating activities	_	(150,041)	
Cash flows from investing activities			
Net cash provided (used) by investing activities	_	-0-	
Cash flows from financing activities			
Net cash provided (used) by financing activities	_	-0-	
Net decrease in cash and cash equivalents	_	(150,041)	
Cash and cash equivalents at beginning of year	1	,207,113	
Cash and cash equivalents at end of year	<u>\$1</u>	<u>,057,072</u>	
Supplemental Disclosure of Cash Flow Information			
Cash paid during the year for:			
Interest	<u>\$</u>	30,000	
Income taxes	<u>\$</u>	3,522	

### SUNBELT SECURITIES, INC. Notes to Financial Statements December 31, 2017

#### Note 1 - Summary of Significant Accounting Policies

Sunbelt Securities, Inc. (the "Company") was formed October 23, 1996 and became effective as a broker-dealer in securities registered with the Securities and Exchange Commission ("SEC") on July 3, 1997 and is a member of the Financial Industry Regulatory Authority ("FINRA"). The Company operates under SEC Rule 15c3-3(k)(2)(ii), which provides that all funds and securities belonging to the Company's customers would be handled by a correspondent broker-dealer. The Company is a Texas corporation, and its customers are located throughout the United States. The accounting and reporting policies of the Company conform to generally accepted accounting principles in the United States of America and to general practices within the securities industry.

Security transactions (and related commission revenue and expense) are recorded on a trade date basis.

Compensated absences have not been accrued because the amount cannot be reasonably estimated.

Commissions receivable and receivables from broker dealers are generally collected in full in the month following their accrual. As such, management has not recorded an allowance for doubtful accounts on these receivables. The Company advances funds to its registered representatives as determined necessary by management. The advances are generally recouped upon the following commission payment cycle. Management records an allowance for bad debts based on a collectability review of specific accounts. Any receivables deemed uncollectible are written off against the allowance.

Securities readily marketable are carried at fair value based upon quoted market prices and securities not readily marketable are carried at fair value as determined by management of the Company. The increase or decrease in net unrealized appreciation or depreciation of securities is credited or charged to operations. The Company's securities are held by the clearing broker-dealer. Should the clearing broker-dealer fail to deliver securities to the Company, the Company may be required to purchase identical securities on the open market.

Securities sold not yet purchased represent an obligation of the Company to deliver specified equity securities at a predetermined price. The Company is obligated to acquire the securities at prevalent market prices in the future to satisfy this obligation.

The Company accounts for income taxes in accordance with the *Income Taxes* Topic of the FASB Accounting Standards Codification. Deferred tax assets and liabilities arising from temporary differences between book and tax basis are recognized using the enacted statutory tax rates and laws that will be in effect when such differences are expected to reverse. Deferred tax assets are recognized for temporary differences that will result in deductible amounts in future years. Deferred tax liabilities are recognized for temporary differences that will result in taxable income in future years. In the case of deferred tax assets, a reduction in deferred tax assets are recorded if it is more likely than not that some portion or all of the deferred tax asset will not be realized. Any interest or penalties associated with income taxes would be included as a component of income tax expense in the period in which the assessment arises.

For purposes of reporting cash flows, the Company has defined cash equivalents as highly liquid investments, with original maturities of less than ninety days that are not held for sale in the ordinary course of business.

### SUNBELT SECURITIES, INC. Notes to Financial Statements December 31, 2017

#### Note 1 - Summary of Significant Accounting Policies, continued

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

#### Note 2 - Fair Value Measurements

The Company uses various methods including market, income and cost approaches to determine fair value. Based on the approach, the Company often utilizes certain assumptions that market participants would use in pricing the asset or liability, including assumptions about risk and or the risks inherent in the inputs to the valuation technique. These inputs can be readily observable, market corroborated, or generally unobservable inputs. The Company utilizes valuation techniques that maximize the use of observable inputs and minimize the use of unobservable inputs. Based on the observability of the inputs used in the valuation techniques the Company is required to provide the following information according to the fair value hierarchy. The fair value hierarchy ranks the quality and reliability of the information used to determine fair values. Financial assets and liabilities carried at fair value will be classified and disclosed in one of the following three categories:

Level 1 - Valuations for assets and liabilities traded in active exchange markets, such as the New York Stock Exchange. Level 1 also includes U.S. Treasury and federal agency securities and federal agency mortgage-backed securities, which are traded by dealers or brokers in active markets. Valuations are obtained from readily available pricing sources for market transactions involving identical assets or liabilities.

Level 2 - Valuations for assets and liabilities traded in less active dealer or broker markets. Valuations are obtained from third party pricing services for identical or similar assets or liabilities.

Level 3 - Valuations for assets and liabilities that are derived from other valuation methodologies, including option pricing models, discounted cash flow models and similar techniques, and not based on market exchange, dealer, or broker traded transactions. Level 3 valuations incorporate certain assumptions and projections in determining the fair value assigned to such assets or liabilities.

For the year ended December 31, 2017, the application of valuation techniques applied to similar assets and liabilities has been consistent.

Securities owned and securities sold not yet purchased represent temporary positions in the Company's error account at fair value and are deemed to be Level 1 investments. There were no transfers into or out of the Level 1, 2 or 3 categories in the fair value measurement hierarchy for the fiscal year ended December 31, 2017.

### SUNBELT SECURITIES, INC. Notes to Financial Statements December 31, 2017

### Note 3 - Net Capital Requirements

Pursuant to the net capital provisions of Rule 15c3-1 of the Securities Exchange Act of 1934, the Company is required to maintain a minimum net capital, as defined under such provisions. Net capital and the related net capital ratio may fluctuate on a daily basis.

At December 31, 2017, the Company had net capital of approximately \$975,772 and net capital requirements of \$100,000. The Company's ratio of aggregate indebtedness to net capital was .75 to 1. The Securities and Exchange Commission permits a ratio of no greater than 15 to 1.

### Note 4 - Income Taxes

The Company's federal and state income tax returns are subject to examination over various statutes of limitations generally ranging from three to five years.

### Note 5 - Concentration Risk

At various times during the year, the Company had cash balances in excess of federally insured limits.

### Note 6 - Lease Commitments

The Company leases office space under long-term non-cancelable leases. Future minimum lease payments under the leases at December 31, 2017 are as follows:

\$ 185,5	45
189,6	99
193,8	53
198.0	<b>)</b> 7
· · · · · · · · · · · · · · · · · · ·	
· · · · · · · · · · · · · · · · · · ·	_
	\$ 185,5- 189,69 193,89 198,00 <u>997,3</u> \$ 1,764,44

Rental expense for the year ended December 31, 2017 was \$76,440 and is reflected in occupancy and equipment costs.

### Note 7 - Commitments and Contingencies

Included in the Company's clearing agreement with its clearing broker-dealer, is an indemnification clause. This clause relates to instances where the Company's customers fail to settle security transactions. In the event this occurs, the Company will indemnify the clearing broker-dealer to the extent of the net loss on the unsettled trade. At December 31, 2017, management of the Company had not been notified by the clearing broker-dealer, nor were they otherwise aware, of any potential losses relating to this indemnification.

Supplementary Information

Pursuant to Rule 17a-5 of the

Securities Exchange Act of 1934

as of

December 31, 2017

### Schedule I

# SUNBELT SECURITIES, INC. Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission As of December 31, 2017

### **COMPUTATION OF NET CAPITAL**

Total stockholders' equity qualified for net capital	\$	1,136,035
Add: Other deductions or allowable credits	_	-0-
Total capital and allowable subordinated liabilities		1,136,035
Deductions and/or charges		
Less Non-allowable assets Other receivables – advances Other Receivables in excess of related payable		(103.389) (20,195)
Net capital before haircuts on securities positions	_	1,012,451
Haircuts on securities (computed, where applicable, pursuant to Rule 15c3-(1c)(2) Other securities	_	(36,679)
Net capital	<u>\$</u>	975,772
AGGREGATE INDEBTEDNESS		
Items included in statement of financial condition Accrued expenses Commissions payable	\$	52,036 677,499
Total aggregate indebtedness	<u>\$</u>	<u>729,535</u>

### Schedule I (continued)

# SUNBELT SECURITIES, INC. Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission As of December 31, 2017

### **COMPUTATION OF BASIC NET CAPITAL REQUIREMENT**

Minimum net capital required (6 2/3% of total aggregate indebtedness)	<u>\$</u>	<u>48,636</u>
Minimum dollar net capital requirement of reporting broker or dealer	<u>\$</u>	100,000
Net capital requirement (greater of above two minimum requirement amounts)	<u>\$</u>	100,000
Net capital in excess of required minimum	<u>\$</u>	<u>875,772</u>
Ratio: Aggregate indebtedness to net capital	***	75 to 1
Reconciliation with company's computation		
The difference is the computation of net capital under rule 15c3-1 from the company's computation is as follows:	ws:	
Net capital per unaudited Focus IIa	\$	975.892
Increase in accrued expenses		(120)
Net capital per audited report	<u>\$</u>	<u>975,772</u>

### REVIEW REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM ON MANAGEMENT'S EXEMPTION REPORT

Required By SEC Rule 17a-5

Year Ended December 31, 2017



### Report of Independent Registered Public Accounting Firm

To the Board of Directors Sunbelt Securities, Inc.

We have reviewed management's statements, included in the accompanying Sunbelt Securities, Inc.'s Exemption Report, in which (1) Sunbelt Securities, Inc. identified the following provisions of 17 C.F.R. §15c3-3(k) under which Sunbelt Securities, Inc. claimed an exemption from 17 C.F.R. §240.15c3-3: k(2)(ii) (the exemption provisions) and (2) Sunbelt Securities, Inc. stated that Sunbelt Securities, Inc. met the identified exemption provisions throughout the most recent fiscal year without exception. Sunbelt Securities, Inc.'s management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about Sunbelt Securities, Inc.'s compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph k (2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934.

Dallas, Texas

February 16, 2018

Moss Adams LLP

### Sunbelt Securities Exemption Report

Sunbelt Securities, Inc. (the "Company") is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, "Reports to be made by certain brokers and dealers"). This Exemption Report was prepared as required by 17 C.F.R. §240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

- 1) The Company claimed an exemption from 17 C.F.R. §240.15c3-3 under the following provisions of 17 C.F.R. §240.15c3-3 (k): The Company is exempt from the Customer Protection Rule under Paragraph (k)(2)(ii) as the Company is an introducing broker or dealer, who clears all transactions with and for customers on a fully disclosed basis with a clearing broker or dealer, and who promptly transmits all customer funds and securities to the clearing broker or dealer which carries all of the accounts of such customers and maintains and preserves such books and records pertaining thereto pursuant to the requirements of Rules 17a-3 and 17a-4, as are customarily made and kept by a clearing broker or dealer.
- (1) The Company met the identified exemption provisions in 17 C.F.R. §240.15c3-3(k) throughout the most recent fiscal year without exception.

Sunbelt Securities, Inc.

I, David Smetek, swear (or affirm) that, to my best knowledge and belief, this exemption report is true and correct.

Title President

January 23, 2018